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Atorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Valentino Dimitrov, individually, and on behalf of all others similarly situated;

Case No.: 2:23-CV-00226-PHX-DJH

## Plaintiffs.

vs.

Stavatti Aerospace, Ltd, a Minnesota corporation; Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti Corporation, a Minnesota corporation; Stavatti Immobiliare, Ltd, a Wyoming corporation; Stavatti Industries, Ltd, a Wyoming corporation; Stavatti Niagara, Ltd., a New York corporation; Stavatti Super Fulcrum, Ltd, a Wyoming corporation; Stavatti Ukraine, a Ukrainian business entity; Stavatti Heavy Industries Ltd, a Hawaii corporation; Christopher Beskar and Maja Beskar, husband and wife; Brian Colvin and Corrina Colvin, husband and wife; John Simon and Jean Simon, husband and wife; William McEwen and Patricia McEwen, husband wife; Rudy Chacon and Jane Doe Chacon, husband and wife; and DOES 1 through 10, inclusive,

**[PROPOSED] ORDER GRANTING  
PLAINTIFF'S MOTION FOR ENTRY  
OF DEFAULT JUDGMENT AGAINST  
STAVATTI CORPORATION,  
CHRISTOPHER BESKAR, PATRICIA  
MCEWEN, WILLIAM MCEWEN AND  
JEAN SIMON**

### Defendants.

1 Plaintiff Valentino Dimitrov (“Plaintiff”) requested a default judgment against  
2 Defendants Stavatti Corporation, a Minnesota Corporation; Christopher Beskar; Patricia  
3 McEwen and William McEwen, husband and wife; and Jean Simon (collectively,  
4 “Defendants”). The Clerk of the Court entered the Defendants’ default pursuant to Fed.  
5 R. Civ. P. 55(a). The Court, having examined the pleadings and the record, and for good  
6 cause appearing, finds that the Plaintiff’s request is well-founded and should be granted.

7 **IT IS THEREFORE ORDERED** that Plaintiff is awarded judgment against  
8 Defendants Stavatti Corporation, a Minnesota Corporation; Christopher Beskar; Patricia  
9 McEwen and William McEwen, husband and wife; and Jean Simon as follows:

- 10 A. For an award of Plaintiff’s breach of contract damages of \$6,000,000 for which  
11 Defendants Stavatti Corporation, a Minnesota Corporation; Christopher  
12 Beskar; Patricia McEwen and William McEwen, husband and wife; and Jean  
13 Simon shall be jointly and severally liable;  
14 B. For Plaintiff’s attorneys’ fees and costs, a motion for attorneys’ fees and costs  
15 will be filed pursuant to LRCiv 54.2;  
16 C. For post judgment interest on the above amounts at a rate of 10% per annum;  
17 and  
18 D. For Plaintiff’s attorneys’ fees and costs incurred in enforcing this judgment.

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20 **DATED** this \_\_\_\_\_ day of \_\_\_\_\_ 2023.  
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